

**TSCA PCB INSPECTION
SPOKANE SCHOOL DISTRICT
GLOVER MIDDLE SCHOOL
SPOKANE, WASHINGTON**

FACILITY: Glover Middle School
2404 West Longfellow Avenue
Spokane, Washington 99005-1547

FACILITY CONTACT: Don T. Miller, Principal
Phone: (509) 354-5400
Fax: (509) 354-5399

DATE OF INSPECTION: March 15, 2000

DATE OF REPORT: March 15, 2000

BACKGROUND

A review of the Region 10 TSCA PCB files indicates that Glover Middle School has not previously been inspected.

ENTRY AND FILE REVIEW

I entered the school on March 15, 2000, at approximately 12:00 p.m. Credentials were presented to Don T. Miller, Principal. I explained my intention to conduct a TSCA PCB inspection of the facility. I introduced Bernie Pribish, TSCA case development officer and Jeff McCartney, Spokane School District Itinerant Custodian. I explained to Mr. Miller the reason for the PCB inspection. Mr. Miller read and signed the TSCA Inspection Notice and the TSCA Inspection Confidentiality Notice. The Notices are appended to this inspection Report as Attachment I. Mr. Miller stated that he appreciated our mission and would be interested in hearing what we found. I told Mr. Miller I would provide a briefing at the end of my inspection if he so desired. Mr. Miller stated that he would like a briefing and to be cc'd on any reports and/or findings.

FACILITY INSPECTION

The school generates no waste oils or hazardous wastes of any kind. The transformers within the Middle School are owned by the Spokane School District. Mr. McCartney and Ms. Pribish accompanied me on the physical inspection of the school. Just outside the office area in the main hallway front entrance, we noted a staining on the underside of the fluorescent light fixture. Mr. McCartney obtained a ladder and removed the light cover. The inside of the light cover contained a tar like substance (photograph 1). The exterior of the ballast cover also contained this tar like substance. I requested that Mr. McCartney wear gloves and safety glasses while examining this ballast. Mr. McCartney produced two pairs of orange latex type gloves he had found in the custodial room and donned one pair before resuming examination/handling of the light and ballast. Mr.

McCartney had no safety glasses. The ballast capacitor within the fluorescent fixture was manufactured by Universal, 227 Volt, 60 hertz. There was no indication on the nameplate as to PCB content (photograph 2), nor was the date of manufacture noted. Photograph 3 shows the interior of the ballast cover and shows the tar like substance on the internal surfaces of the light cover. Photograph 4 shows the tar-like substance on the interior of the light cover. Mr. Miller was observing us and I showed him what we had found. We placed traffic cones in the area until the cover could be replaced. The janitor also placed a type of dolly in the center to prevent children and staff from walking around the cones and beneath the leaking fixture. Mr. McCartney removed and double-bagged the gloves he had used to handle the light.

We then proceeded to Room 104. Mr. McCartney again donned protective gloves to examine a ballast. We noted a tar like substance on the external surface of the ballast (photograph 5). Upon removing the ballast cover, all present noted the tar-like substance on the exterior of the internal ballast cover (photograph 6). Photograph 7 shows the Magnetec ballast capacitor. The nameplate indicated it was a non-PCB capacitor. The capacitor was leaking at the time of the inspection.

We then examined a ballast in room 108. The internal ballast cover was covered with tar-like substance (photograph 8). The ballast capacitor was a Universal Series with no indication as to PCB content on the nameplate (photograph 9). Photograph 10 shows the tar-like substance on the internal surface of the light cover itself.

We then examined a ballast in the hallway next to the business office. The ballast capacitor was manufactured by Universal and the nameplate stated that the capacitor contained no PCBs.

We proceeded to room 115 where we examined a Sylvania Quicktronic ballast capacitor. There was a tar-like substance on the internal surface of the ballast cover (photograph 11) and on the surface of the ballast capacitor (photograph 12). There was no indication as to the PCB content of the capacitor noted on the nameplate.

We then examined a light fixture in the main hallway, next to Room 127. Photograph 13 shows a tar like substance on the internal surface of the light fixture. Photograph 14 shows the Universal ballast capacitor with a tar like substance to the right side of the capacitor. There is no indication on the nameplate as to the PCB content in the capacitor. Photograph 15 shows the internal surface of the ballast cover with drops of tar-like substance.

We then proceeded to Room 124. Room 124 contains a Westinghouse transformer, serial number 57B34793. There was no indication as to the type of dielectric fluid on the nameplate. The transformer was not marked with a PCB label (photograph 16). Mr. Brad Wolfrum claims that this type of transformer is air cooled and dry because of vents near the top but could not produce paperwork from the manufacturer confirming that. The configuration diagram normally available to make the determination was not on the nameplate.

At this time our inspection was interrupted by Mr. Joe Madsen, Director of Facilities and Risk Assessment for the School District. Mr. Madsen was accompanied by Leandra Thompson, Project Officer. Mr. Madsen was very upset and angry. He stated he "wanted to know why we were

making rash statements about closing down schools and upsetting people." I asked Mr. Madsen what he was referring to. Mr. Madsen stated that as he entered the school, he had heard the principle say that "EPA was shutting down the school." I explained that Mr. Miller had been joking with us since we arrived and had made that statement about five times in jest - every time he passed us in the hallway he called out to us and made the same statement and laughed. Ms. Pribish confirmed this. Mr. Madsen did not believe this and accused me of making false and alarming statements to school personnel and failing to call him directly when ever a problem was noted. I was taken aback by Mr. Madsen's accusations and his interference and interruption of the inspection. I told Mr. Madsen that we would first go to Mr. Miller and have him clarify his statement in Mr. Madsen's presence. We approached Mr. Miller and he readily admitted that he was a prankster and liked to joke and that he had been saying this since we arrived as "teasing." He informed Mr. Madsen that he was glad we were there and repeated that statement twice to Mr. Madsen directly. Mr. Madsen and I then left Mr. Miller to talk privately. Mr. Madsen stated that despite what Mr. Miller said he had had "other complaints." I requested that Mr. Madsen describe the nature of the complaints to me directly so that we could address them together. Mr. Madsen refused, stating only that " he had received two e-mails" - one from Hutton Elementary and one from Shadle High School. The one from Hutton Elementary stated the inspection team was "cranky" and the one from Shadle stated that we were "scaring staff." I stated that I was very surprised at this. At Hutton we had an excellent meeting with the principal designee and the Head Custodian, which were the only two people we met with . At Shadle the only issues raised regarding health were those raised by the principle himself, when he was informed that there were leaking ballast in the library and he asked what would happened if the books became contaminated. I offered to go with Mr. Madsen and speak directly to the staff who wrote the e-mails. Mr. Madsen refused then stated that the concerns were not raised by the people who met with us but by others who had observed us. I still offered to talk with anyone to clear up any misunderstanding. Mr. Madsen then became angry because he felt the "tone of the inspection" with regard to the presentation of credentials and notices was rude. I explained that the presentation of the credentials and notices are required by statute and we have no choice in the matter and reminded Mr. Madsen that I had used the same procedure with District personnel and had made a special point of mentioning to him and Mr. Mannix during our initial meeting that credentials would be shown and notices issued at each school inspected and I specifically requested that he include in his e-mail to the principals the fact that I would be showing credentials and issuing notices. Mr. Madsen then said it was "my tone." When I asked him to explain or at least allow me to talk with whomever had raised the issue, he refused to do so. Mr. Madsen then accused me of failing to communicate with him directly. I expressed surprise in that we had only begun the inspection at Glover when he had interrupted us and I had already had Mr. McCartney attempting to reach not only Mr. Madsen but Mr. Wolfrum and the Industrial Hygienist - all of whom had been at lunch and Mr. McCartney had left messages. Mr. Madsen stated that wasn't good enough because he had a cell phone and I was to contact him directly. I explained to Mr. Madsen that he had not made this requirement clear when I met with him on Monday. That I had communicated through his representative Mr. McCartney whom he had assigned to us and that I had also talked directly to Mr. Wolfrum on electrical matters as originally requested. I reminded Mr. Madsen that he had informed me in our opening conference on Monday, that the duties covering ballasts, transformers, etc. were divided between his shop , that of Mr. Mannix, and others whom he did not identity. At no time during any conversation between Mr. Madsen and myself was it ever requested that we provide a step by step briefing to Mr. Madsen other than the scheduled out-briefing for Thursday,

March 16, 2000 at 4:30. Mr. Madsen stated that from this point on I was to call him every time we found something. I told him we would do so and asked if he would like to accompany us on the rest of the inspection of Glover Middle School. Mr. Madsen declined but stated he would be sending Leandra Thompson to observe and accompany us for the remainder of the inspection. When Ms. Thompson arrived she repeatedly stated that she was not familiar with the PCB regulations and was "relying heavily on my telling her what to do." I provided Ms. Thompson with a copy of the Regional Administrator's February 15, 2000 letter to all school superintendents which outlines the District's responsibility in these matters. Ms. Thompson acknowledged that she had seen the letter but had only recently given it to other staff members. Ms. Thompson was not familiar with the electrical or custodial practices at any of the schools, nor was she knowledgeable of the regulations concerning PCBs and could not answer any questions directed to her during the remainder of the inspection.

We proceeded to Room 137. Room 137 contained two transformers. A Westinghouse wall mounted transformers (approximately 11 X 9 inches), 60 cycles, 480 volts, 5 KVA, style 3238701A18. There was no indication on the nameplate as to the type of dielectric fluid contained in the transformer. The transformer was not marked with a PCB label (photograph 17). The entrance to the room was not marked with a PCB label (photograph 18). The second transformer was also a Westinghouse, serial number 57K9922, 150 KVA, 480 volts, 3 phase, style 234A201G07, 60 cycles. There was no indication on the nameplate as to the dielectric fluid, however the transformer was vented and possibly could be a dry-type air-cooled. The transformer was not marked with a PCB label (photographs 19 & 20).

Room 144 also contained a Westinghouse transformer, serial number 58811805, style 2344A201G04, 480 volts, 45 KVA, 3 phase transformer. There was no indication on the nameplate as to the type of dielectric fluid in the transformer. The District claims the transformer is dry because of vents on the upper portion of the transformer but could provide no manufacture information to support the claim. The nameplate did not state "dry -type". The transformer was not marked with a PCB label (photograph 21). Room 144 also contained a Square D, 3 phase, dry-type transformer, 45 KVA, style number 33-749-17212-082. The door to room 144 was not marked with a PCB label (photograph 22).

Room 178 contained two transformers. The first transformer was a Westinghouse, 3 phase, 480 volts, 30 KVA, serial number 234A201G03. There was no indication as to the type of dielectric fluid contained in the transformer. The transformer was not marked with a PCB label (photograph 23). The second transformer in room 178, was a Square D, 3 phase, dry-type general transformer. The entrance to room 178 was not marked with a PCB label (photograph 24).

In boiler room A, there were two transformers. The first transformer was a small (7.5 X 10 inches) Westinghouse wall mounted transformer, Type EP, single phase, style 323B701A17, 480 volts, 60 cycles, 3 KVA. There was no indication on the nameplate as to the type of dielectric fluid. The transformer was not marked with a PCB label (photograph 25). The second transformer was a Westinghouse, 3 phase, 480 volts, 30 KVA, 60 cycles, serial number 58B17725 (photographs 26 and 27). The transformer was surrounded by cardboard, wood, and other materials. The entrance to the boiler room was not marked with a PCB label (photograph 28).

In the hallway outside room 156, we examined a fluorescent light fixture. In observing the light, there was a dark substance on the interior of the light cover. Mr. McCartney donned gloves and then removed the light cover. There was a tar-like substance on the external surface of the ballast cover (photograph 29). There was a tar-like substance on the internal surface of the light cover (photograph 30). There was also a tar-like substance in the internal surface of the ballast cover (photograph 31). The ballast capacitor was a Universal Wait Reducer, 277 volts, 60 hertz, marked non PCB. It was determined that the leaks were from the previous ballast not the Universal non-PCB capacitor. Subsequent discussions with Mr. Joe Madsen via cell phone, revealed that often leaking or broken capacitors were removed and replaced with newer capacitors without requiring cleanup of the substances that had leaked from the old capacitor. Mr. Madsen had no records of which type of ballast had previously been in this light. Mr. Madsen noted that even though the ballast says non-PCB, the substance that had leaked could contain PCBs.

Outside room 158 we observed a broken light cover whose internal surface showed evidence of staining (photograph 32). Mr. McCartney donned protective gloves and removed the light cover. There was also a tar-like substance on the internal surface of the ballast cover (photograph 33). The capacitor nameplate contained no information as to PCB content nor did have a manufacture date. There was a tar-like substance on the surface of the ballast capacitor (photographs 34 and 35).

In the library, we examined a fluorescent light fixture. Mr. McCartney donned protective gloves and removed the light cover. The interior of the ballast cover contained a tar-like substance (photograph 36). The ballast capacitor was an Advance, class P, type 1, non-PCB capacitor which was intact and non-leaking (photograph 37). The tar-like substances covering the light cover and interior of the ballast were from the previous capacitor. District Project Officer Leandra Thompson, who was present representing Mr. Madsen and is responsible for some portion of management of the District's PCB program, could not tell us what type of leaking capacitor had been removed from the ballast, when it had been removed or why during the removal the leaks had not been cleaned from the internal and external surfaces. According to Ms. Thompson, the district does not keep records of these events nor require cleanup prior to replacement of ballasts.

In room 149 we observed a leaking ballast with a tar like substance on the internal surface of the ballast cover (photograph 39 (note photo 38 was a mis-shoot)). The capacitor within the ballast was a Universal Hi-Output Rapid Start, 277 volts, 60 cycles. There was no indication as to the PCB content of the capacitor nor was a manufacture date on the nameplate (photograph 40).

Since classroom 149 was empty for the day, we agreed that we would examine all of the ballasts. The next ballast examined had a tar-like substance on the internal surface of the ballast cover (photograph 41) and a tar-like substance was on the interior surface of the ballast fixture (photograph 42). The capacitor was a Magnetek, 27 volts, 60 hertz, class P, non-PCB capacitor (photograph 43). It appears that the tar-like substance came from the previous capacitor and the leaks were not cleaned up when the capacitor was changed out. Again, Mr. Madsen's representative, Ms. Leandra Thompson, District Project Officer, could not tell us what type of leaking capacitor had been removed, when it had been removed, or disposed of, nor was there paperwork to document removal.

The next ballast examined in room 149 was directly above a student's desk. The capacitor had ruptured and there was a tar-like substance on the external surface of the capacitor (photograph 44) and there was tar-like substance on the ballast cover (photograph 45). The capacitor was a GE rapid start ballast and appeared to be very old and was leaking. There was no indication on the nameplate as to the PCB content in the capacitor nor was there a manufacture date on the nameplate.

The next ballast in Room 149 was also leaking. There was a tar-like substance on the interior surface of the ballast cover (photograph 46). The capacitor was a GE rapid start that appeared to be very old. There was no indication on the nameplate as to PCB content and nor was there a manufacture date on the nameplate (photograph 47). There was a tar like substance on the external surface of the capacitor. Student's desks were directly beneath this ballast.

The next ballast was also leaking. There was a tar-like substance on the external surface of the ballast cover (photograph 48). The capacitor was a Universal Therm-o-Matic 277 volts, 60 hz. There was no indication as to PCB content on the nameplate nor was there a manufacture date on the nameplate (photograph 49). Student's desks were directly beneath the ballast.

The next ballast was a GE rapid start, 277 volts, 60 cycles. There was no indication as to PCB content on the nameplate nor was there a manufacture date on the nameplate. The capacitor was intact and non-leaking (photograph 50).

Mr. McCartney, Ms. Pribish, Ms. Thompson and I returned to custodian room 126, where the gloves used during the inspection by Mr. McCartney were double wrapped and bagged and turned over to Leandra Thompson (photograph 51). Ms. Thompson stated that she was not familiar with the PCB regulations and asked what to do with the gloves. I went over the regulations with her and she stated she would contact Don Ganyo, Industrial Hygienist to come and remove the package and it would be stored in the custodial room until Mr. Ganyo picked it up. We then left the facility.

OUT BRIEFING

There was no out briefing because the principal had left the school for the day by the time the inspection was completed.

ATTACHMENTS

1. TSCA Inspection and Confidentiality Notices
2. Photographs

3-23-00
DATE REPORT SUBMITTED


INSPECTOR'S SIGNATURE



United States Environmental Protection Agency
Washington, D.C. 20460

Toxic Substances Control Act

NOTICE OF INSPECTION

Form Approved
OMB No. 2070-0007
Approval Expires 07-31-96

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Time	3. Firm Name
Date 3-15-00	Inspector No. 16131	Daily Seq. No. 007	12:00 pm	Glover middle School
4. Inspector Address U.S EPA RIO 1200 Sixth Ave (OEPA-095) Seattle, WA 98101				5. Firm Address 2404 W. Longfellow Ave Spokane, WA 99005-1547

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

- ☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to (Check appropriate blocks):

- | | |
|--|--|
| <input type="checkbox"/> A. Financial data | <input type="checkbox"/> D. Personnel data |
| <input type="checkbox"/> B. Sales data | <input type="checkbox"/> E. Research data |
| <input type="checkbox"/> C. Pricing data | |

The nature and extent of inspection of such data specified in A through E above is as follows:

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Inspector Signature <i>Mary Eileen Hileman</i>		Recipient Signature <i>Don T. Miller</i>	
Name <i>M. Eileen Hileman</i>		Name <i>Don T. Miller</i>	
Title <i>Inspector</i>	Date Signed <i>3-15-00</i>	Title <i>Principal</i>	Date Signed <i>3/15/00</i>



United States Environmental Protection Agency
Washington, D.C. 20460
Toxic Substances Control Act

Form Approved
OMB No. 2070-0007
Approval Expires 10-31-92

TSCA INSPECTION CONFIDENTIALITY NOTICE

The public reporting burden for this collection of information is estimated to average 5 minutes per response. This estimate includes time for reviewing instructions, searching existing data sources, gathering and maintaining the needed data, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information to the Chief, Information Policy Branch (PM-223), US Environmental Protection Agency, 401 M Street, SW, Washington, DC 20460, and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503, marked ATTENTION: Desk Officer for EPA.

1. Investigation Identification			2. Firm Name
Date 3-15-00	Inspector No. 16131	Daily Seq. No. 007	Glover Middle School
3. Inspector Name M. Eileen Hileman			4. Firm Address 2404 W. Longfellow Ave Spokane, WA 99005-1547
5. Inspector Address U.S. EPA R1D 1200 Sixth Ave (DEA-095) Seattle, WA 98101			6. Chief Executive Officer Name X Don T. Miller
			7. Title X Principal

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of the Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice.

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature X Don T. Miller	Name
Name X Don T. Miller	Title
Title X Principal	Address
Date Signed X 3/15/00	

ATTACHMENT II

**PHOTOGRAPHY LOG
GLOVER MIDDLE SCHOOL
SPOKANE SCHOOL DISTRICT
SPOKANE, WASHINGTON**

Photograph 1 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 1 shows the interior of a light cover from the main hallway front entrance that contained a tar like substance. The exterior of the ballast cover also contained this tar like substance.



Photograph 2 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 2 shows ballast capacitor in the light fixture in the main hallway front entrance. The ballast capacitor was manufactured by Universal, 227 Volt, 60 hertz. There was no indication on the nameplate as to PCB content.

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Photograph 2 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 2 shows ballast capacitor in the light fixture in the main hallway front entrance. The ballast capacitor was manufactured by Universal, 227 Volt, 60 hertz. There was no indication on the nameplate as to PCB content.

Photograph 3 was taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 3 shows the interior of the ballast cover and shows the tar like substance on the internal surfaces of the light cover.



Photograph 4 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 4 shows the tar-like substance on the interior of the light cover.

Photograph 5 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 5 shows a tar-like substance on the exterior of the ballast cover in Room 104.



Photograph 6 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 6 shows the leaking Magnetec ballast capacitor at the time of the inspection

Photograph 7 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane Washington. Photograph 7 shows the Magnetec ballast capacitor. The nameplate indicated it was a non-PCB capacitor.



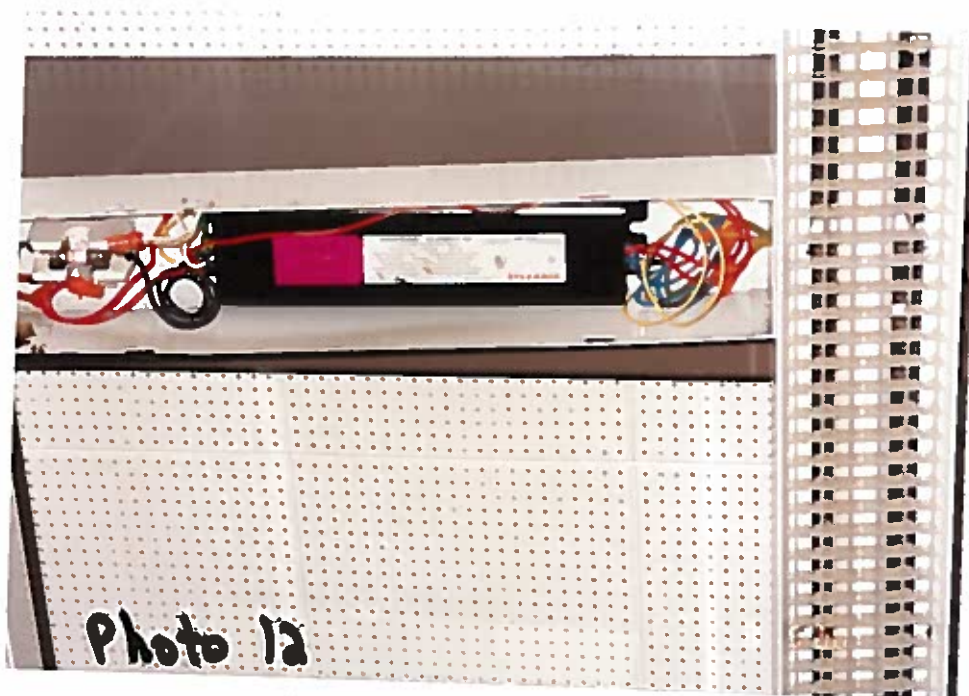
Photograph 8 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 8 shows the ballast cover of a Universal capacitor in Room 108. The internal surface of the ballast cover was contained a tar-like substance.

Photograph 9 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 9 shows the leaking Universal capacitor in Room 108. There was no indication on the nameplate as to the PCB content in the capacitor and there was no manufacture date on the capacitor.



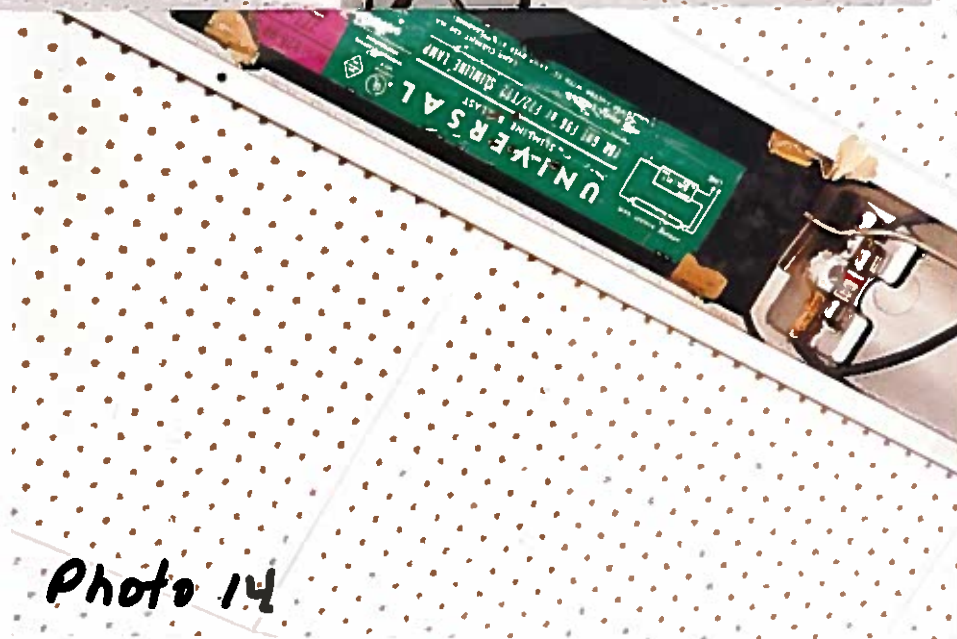
Photograph 10 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 10 shows the tar-like substance on the internal surface of the light cover itself in Room 108.

Photograph 11 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 11 shows a tar-like substance on the internal surface of a ballast cover in Room 115.



Photograph 12 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 12 show the Sylvania Quicktronic ballast capacitor in Room 115. There was a tar-like substance on the surface of the ballast capacitor. There was no indication as to the PCB content of the capacitor noted on the nameplate nor was a manufacture date listed.

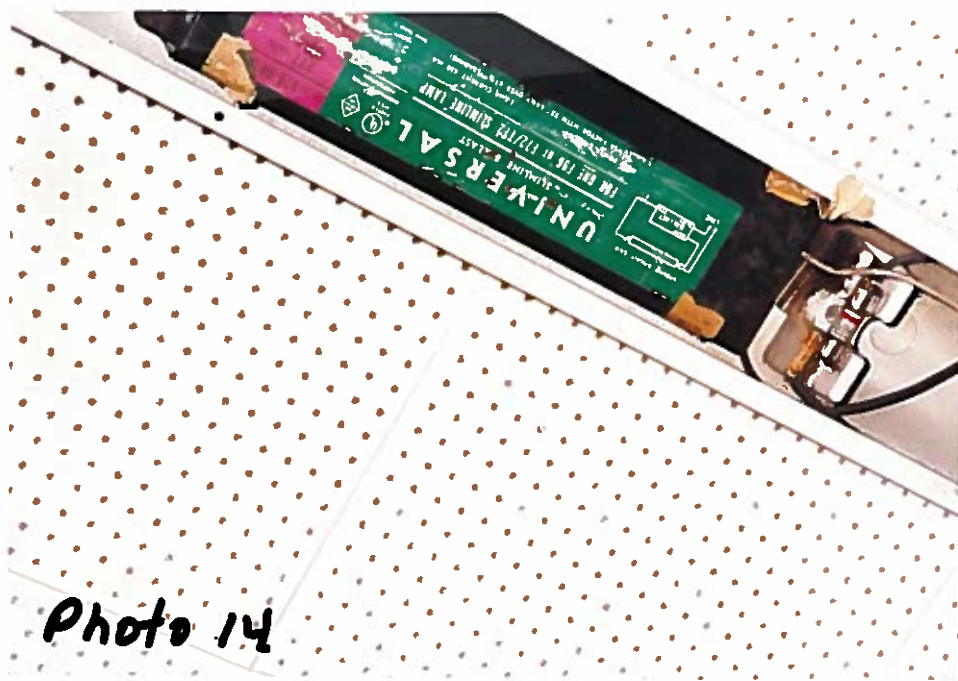
Photograph 13 taken by Eileen Hileman on March 15, 2000 at Glover Middle School, Spokane, Washington. Photograph 13 shows a tar-like substance to the right of the capacitor within the ballast fixture in the main hallway, next to Room 127.



Photograph 14 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 14 shows the Universal ballast capacitor with a tar like substance to the right side of the capacitor in the main hallway, next to Room 127. There is no indication on the nameplate as to the PCB content in the capacitor, nor is a date of manufacture listed on the nameplate.

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Photograph 14 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 14 shows the Universal ballast capacitor with a tar like substance to the right side of the capacitor in the main hallway, next to Room 127. There is no indication on the nameplate as to the PCB content in the capacitor, nor is a date of manufacture listed on the nameplate.

Photograph 15 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 15 shows the internal surface of the ballast cover of the fluorescent light fixture in the main hallway next to Room 127..



Photograph 16 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 16 shows a Westinghouse Transformer, serial number 57B34793, in room 124. There was no indication as to the type of dielectric fluid on the nameplate. The transformer was not marked with a PCB label (photograph 16). Mr. Brad Wolfrum claims that this type of transformer is air cooled and dry because of vents near the top but could not produce paperwork from the manufacturer confirming that. The configuration diagram normally available to make the determination was not on the nameplate.

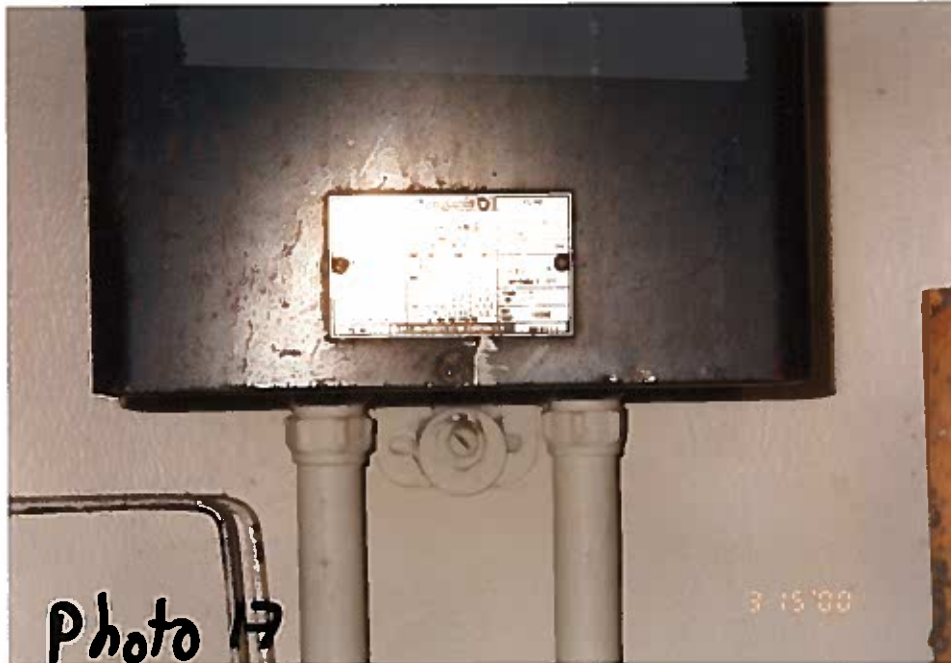
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escent light



Photograph 16 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 16 shows a Westinghouse Transformer, serial number 57B34793, in room 124. There was no indication as to the type of dielectric fluid on the nameplate. The transformer was not marked with a PCB label (photograph 16). Mr. Brad Wolfrum claims that this type of transformer is air cooled and dry because of vents near the top but could not produce paperwork from the manufacturer confirming that. The configuration diagram normally available to make the determination was not on the nameplate.

Photograph 17 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 17 shows a Westinghouse wall mounted transformers (approximately 11 X 9 inches), 60 cycles, 480 volts, 5 KVA, style 3238701A18 in Room 137. There was no indication on the nameplate as to the type of dielectric fluid contained in the transformer. The transformer was not marked with a PCB label.



Photograph 18 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 18 shows the entrance to the Room 137 was not marked with a PCB label.

Photographs 19 & 20 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photographs 19 & 20 shows the second transformer housed in Room 137. The second transformer was also a Westinghouse, serial number 57K9922, 150 KVA, 480 volts, 3 phase, style 234A201G07, 60 cycles. There was no indication on the nameplate as to the dielectric fluid, however the transformer was vented and possibly could be a dry-type air-cooled. The transformer was not marked with a PCB label.



Photograph 21 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 21 shows a Westinghouse transformer, serial number 58811805, style 2344A201G04, 480 volts, 45 KVA, 3 phase transformer in Room 144. There was no indication on the nameplate as to the type of dielectric fluid in the transformer. The District claims the transformer is dry because of vents on the upper portion of the transformer. The transformer was not marked with a PCB label.

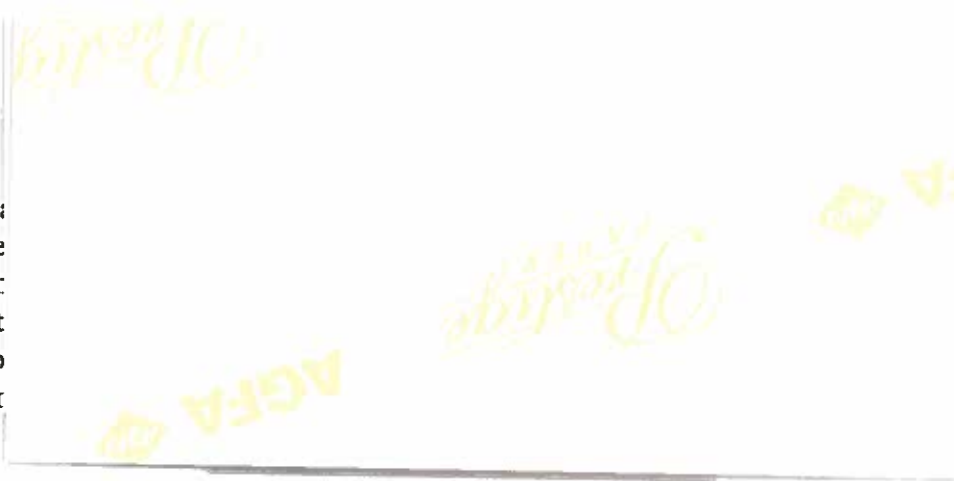
Photograph
Spokane
The second
phase, st
fluid, ho
transformer

Glover Middle School,
in Room 137.
A, 480 volts, 3
to the dielectric
-cooled. The

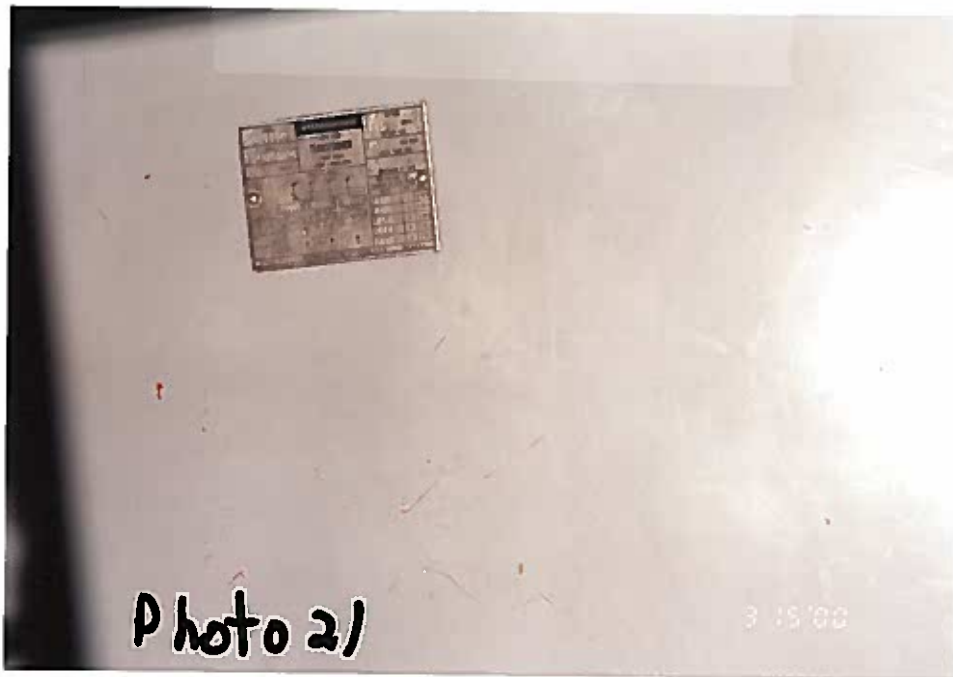


Photograph 21 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 21 shows a Westinghouse transformer, serial number 58811805, style 2344A201G04, 480 volts, 45 KVA, 3 phase transformer in Room 144. There was no indication on the nameplate as to the type of dielectric fluid in the transformer. The District claims the transformer is dry because of vents on the upper portion of the transformer. The transformer was not marked with a PCB label.

Photograph
Spokane
The second
phase, still
fluid, however
transformer

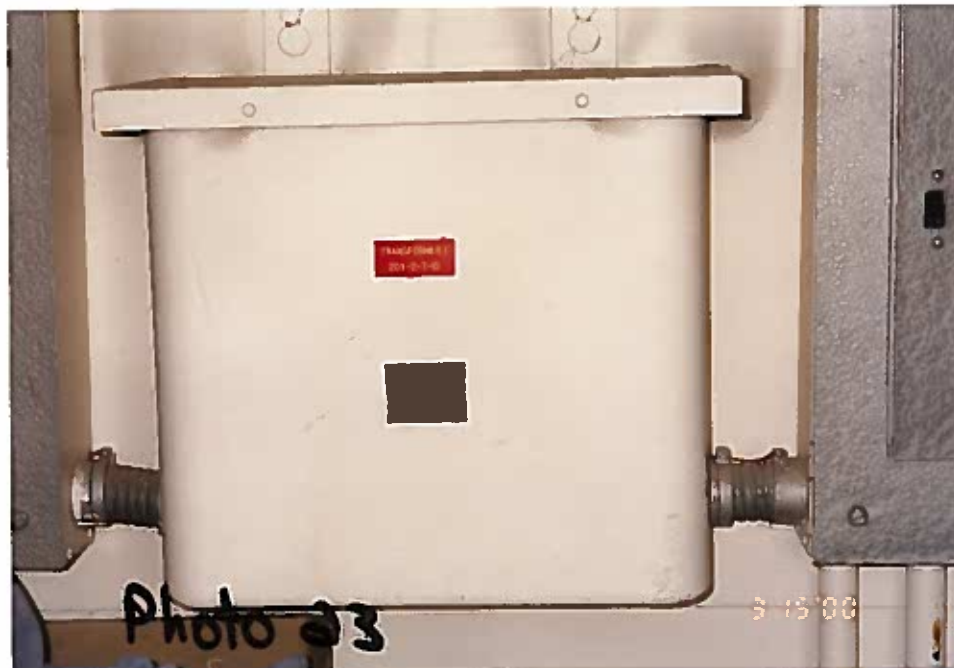


Glover Middle School,
in Room 137.
A, 480 volts, 3
to the dielectric
cooled. The



Photograph 21 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 21 shows a Westinghouse transformer, serial number 58811805, style 2344A201G04, 480 volts, 45 KVA, 3 phase transformer in Room 144. There was no indication on the nameplate as to the type of dielectric fluid in the transformer. The District claims the transformer is dry because of vents on the upper portion of the transformer. The transformer was not marked with a PCB label.

Photograph 22 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 22 shows the door to Room 144 was not marked with PCB label.



Photograph 23 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 23 shows a Westinghouse, 3 phase, 480 volts, 30 KVA, serial number 234A201G03 in Room 178. There was no indication as to the type of dielectric fluid contained in the transformer. The transformer was not marked with a PCB label.

Photograph 24 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 24 shows the entrance to room 178 was not marked with a PCB label.



Photograph 25 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 25 shows a small (7.5 X 10 inches) Westinghouse wall mounted transformer, Type EP, single phase, style 323B701A17, 480 volts, 60 cycles, 3 KVA located in Boiler Room A. There was no indication on the nameplate as to the type of dielectric fluid. The transformer was not marked with a PCB label.

Photograph 24 taken at
Washington. Photo

r Middle School, Spokane,
marked with a PCB label.



Photograph 25 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 25 shows a small (7.5 X 10 inches) Westinghouse wall mounted transformer, Type EP, single phase, style 323B701A17, 480 volts, 60 cycles, 3 KVA located in Boiler Room A. There was no indication on the nameplate as to the type of dielectric fluid. The transformer was not marked with a PCB label.

Photographs 26 & 27 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photographs 26 & 27 shows the second transformer in Boiler Room A was a Westinghouse, 3 phase, 480 volts, 30 KVA, 60 cycles, serial number 58B17725. There was no indication on the nameplate as to the type of dielectric fluid. The transformer was not marked with a PCB label. The transformer was surrounded by cardboard, wood, and other materials.



Photograph 28 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 28 shows the entrance to the Boiler room was not marked with a PCB label.

Photograph
Spokane,
a Westing
indication
a PCB label

Glover Middle School,
Room A was
There was no
t marked with
labels.



Photograph 28 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 28 shows the entrance to the Boiler room was not marked with a PCB label.

Photograph
Spokane,
a Westing
indication
a PCB label



iddle School,
Room A was
There was no
marked with
als.



Photograph 28 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 28 shows the entrance to the Boiler room was not marked with a PCB label.

Photograph 29 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 29 shows a tar-like substance on the external surface of a ballast cover of a fluorescent light fixture located in the hallway outside room 156.



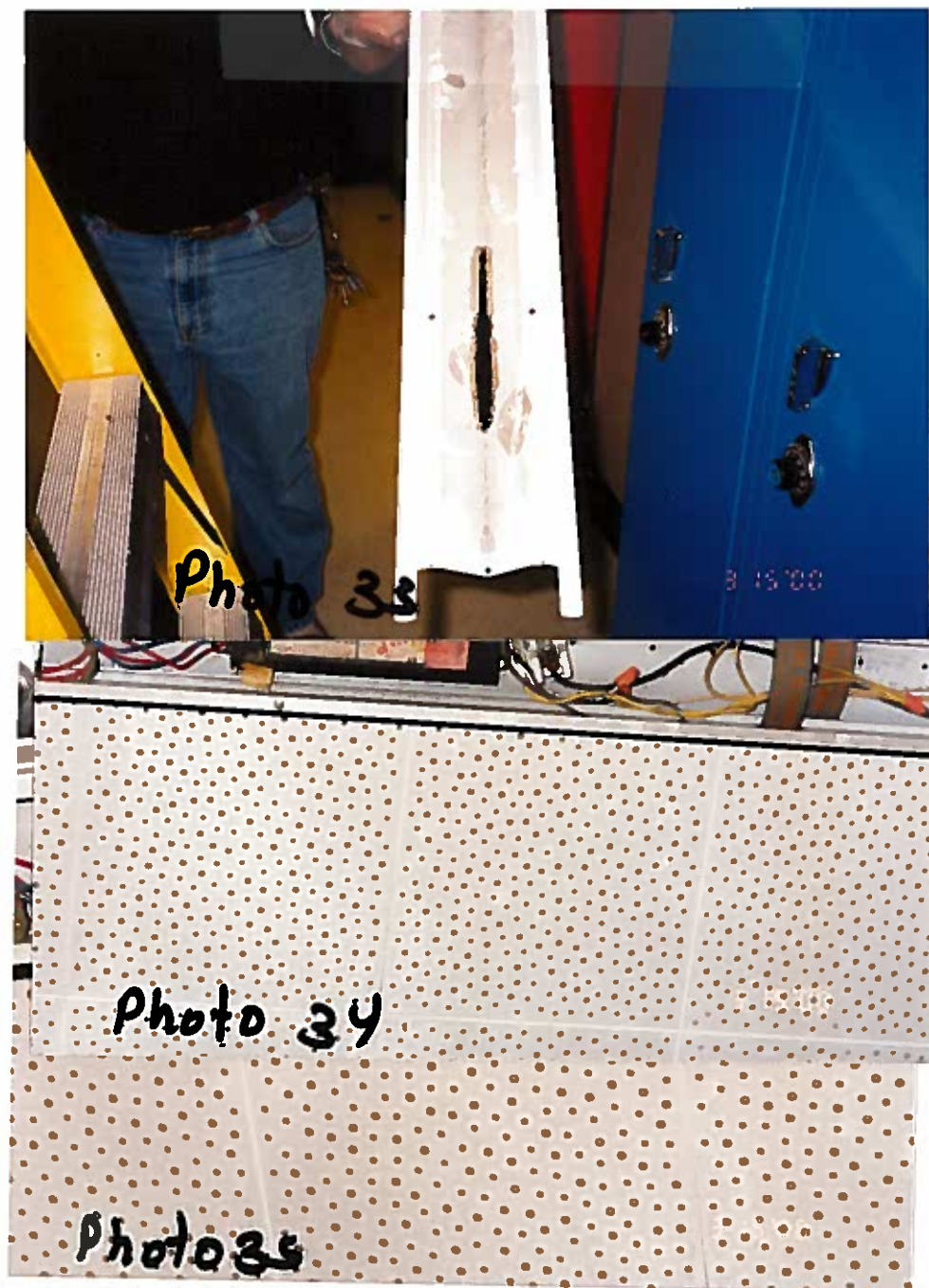
Photograph 30 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 30 shows there was a tar-like substance on the internal surface of the light cover located in the hallway outside Room 156.

Photograph 31 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 31 shows the tar-like substance on the internal surface of the ballast cover located in the hallway outside Room 156.



Photograph 32 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 32 shows a broken light cover outside room 158 whose internal surface showed evidence of staining.

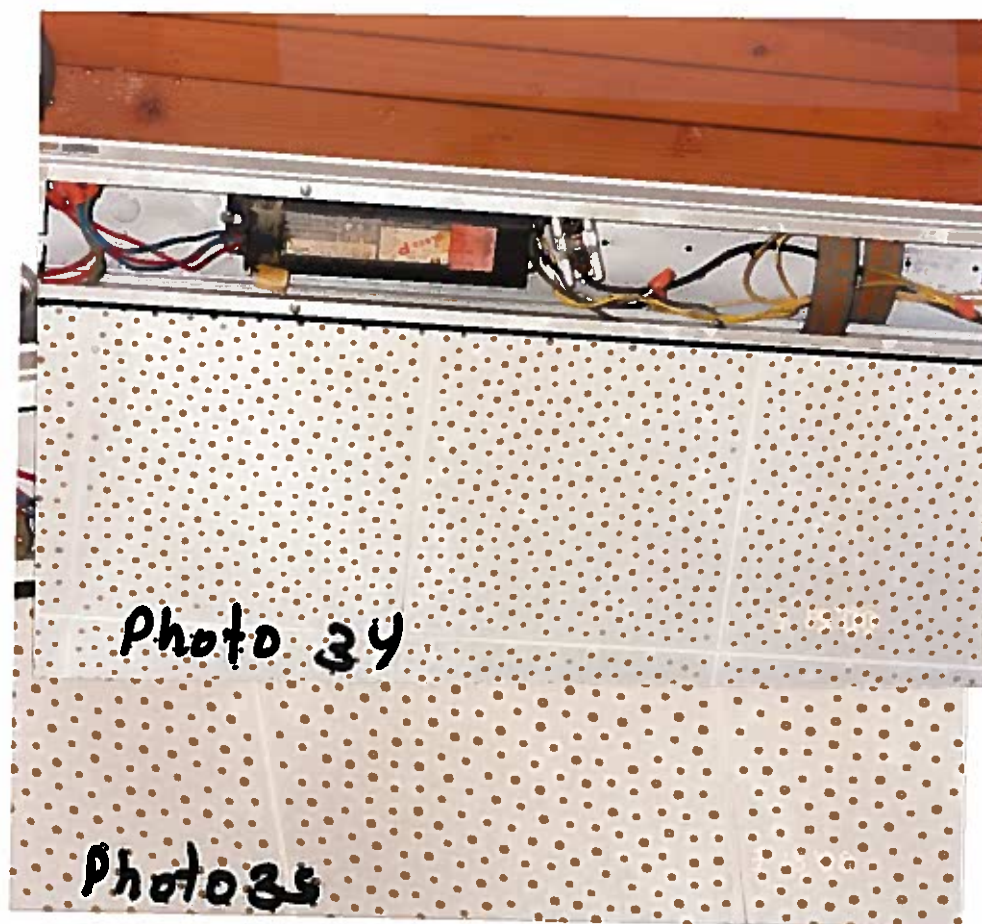
Photograph 33 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 33 shows that there was also a tar-like substance on the internal surface of the ballast cover outside Room 158



Photographs 34 & 35 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photographs 34 & 35 show the capacitor nameplate contained no information as to PCB content nor did have a manufacture date. There was a tar-like substance on the surface of the ballast capacitor.

Photograph
Washington
of the ballast

l, Spokane,
ernal surface

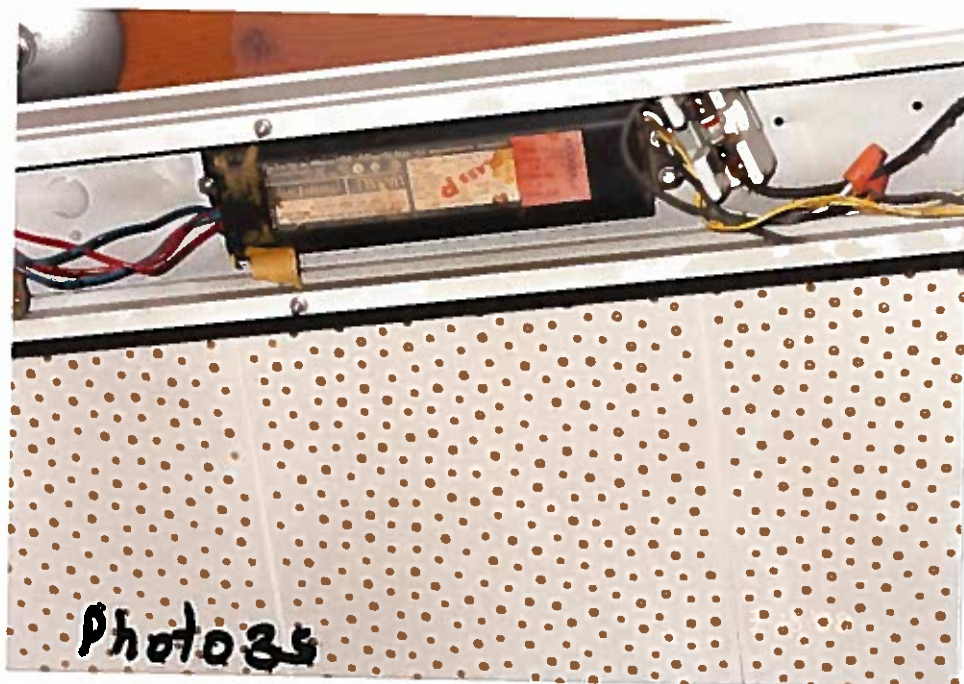


Photographs 34 & 35 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photographs 34 & 35 show the capacitor nameplate contained no information as to PCB content nor did have a manufacture date. There was a tar-like substance on the surface of the ballast capacitor.

Photograph
Washington
of the ballast

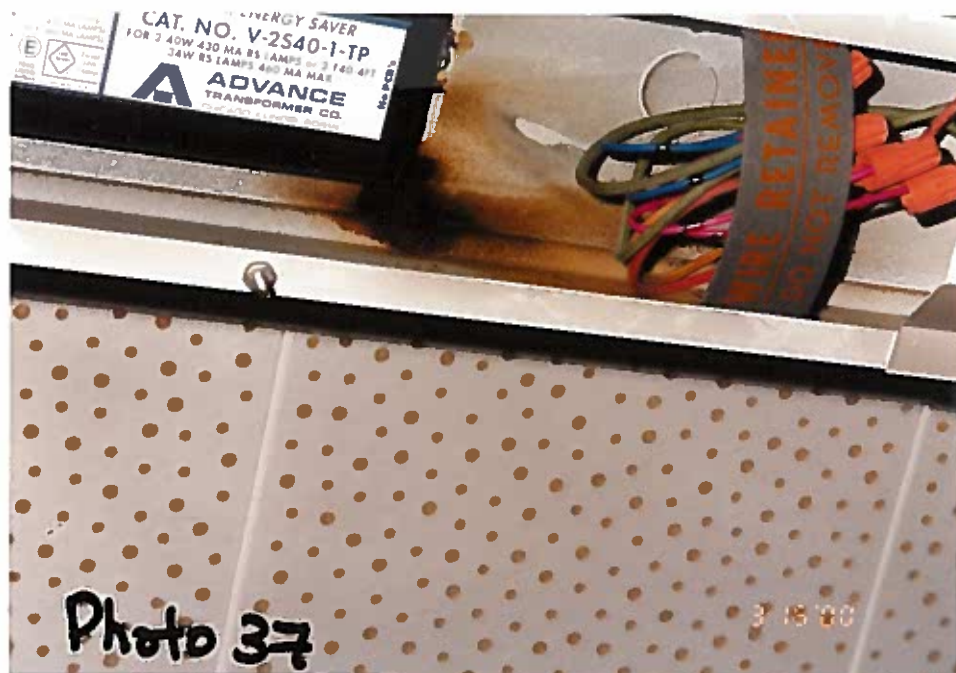


Spokane,
al surface



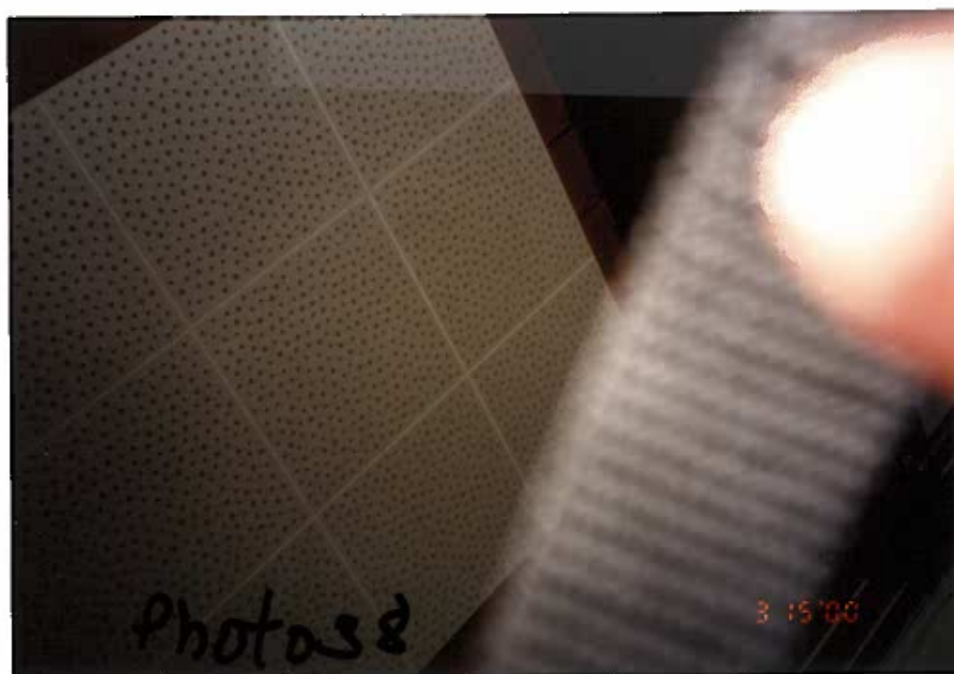
Photographs 34 & 35 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photographs 34 & 35 show the capacitor nameplate contained no information as to PCB content nor did have a manufacture date. There was a tar-like substance on the surface of the ballast capacitor.

Photograph 36 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 36 shows the interior of a light ballast in Library. The interior of the ballast cover contained a tar-like substance.



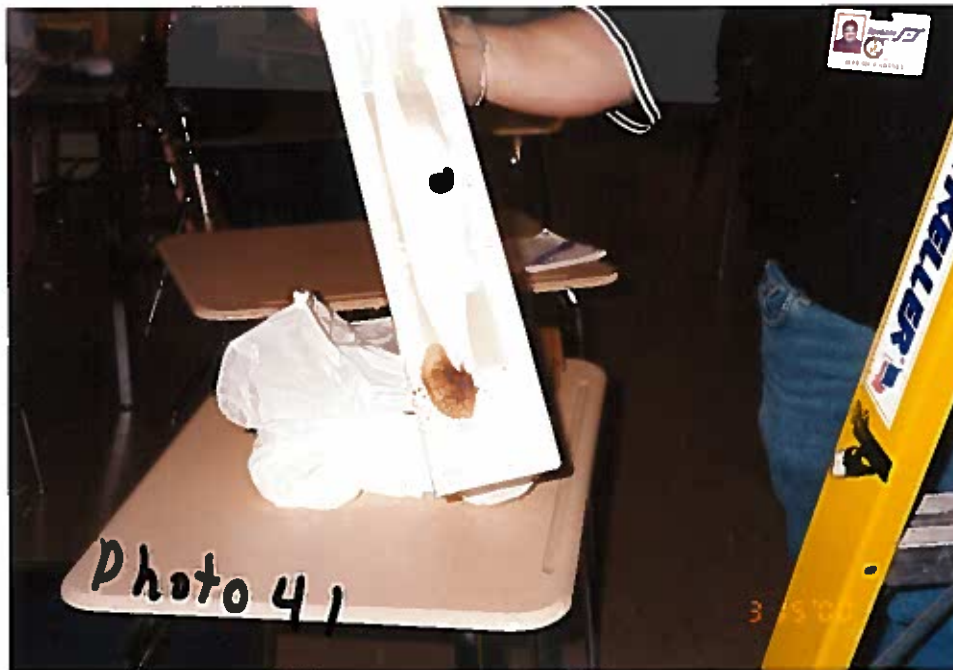
Photograph 37 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 37 shows that the ballast capacitor examined in the Library was an Advance, class P, type 1, non-PCB capacitor which was intact and non-leaking. Photograph 37 also shows the tar-like substance within the internal surface of the ballast.

Note Photo 38 was mis-shoot



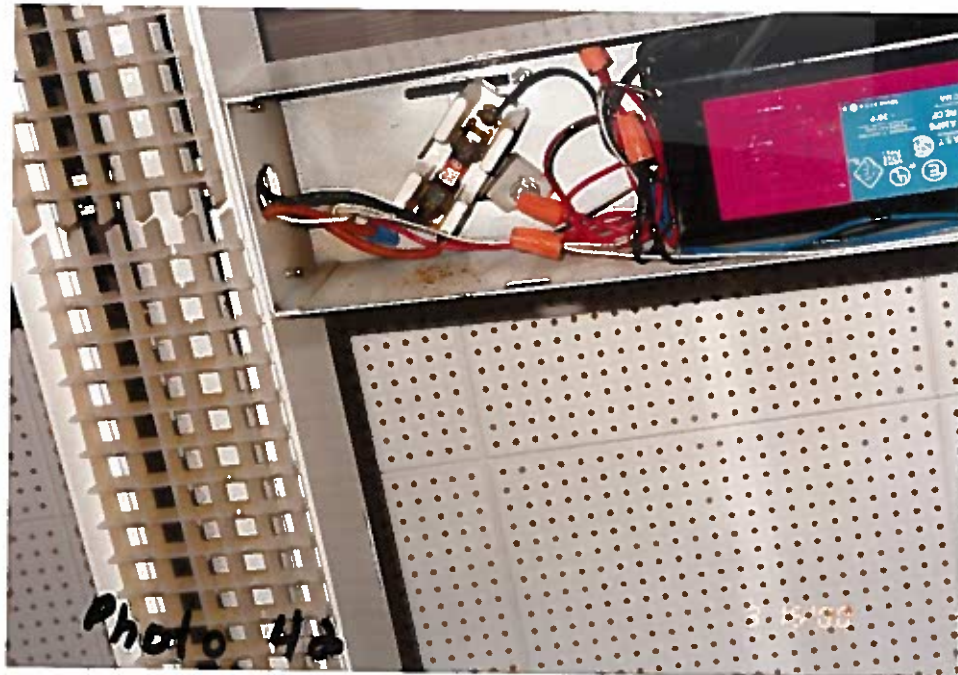
Photograph 39 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 39 shows the internal surface of a ballast cover in Room 149.

Photograph 40 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 40 shows the capacitor within the ballast in Room 149 was a Universal Hi-Output Rapid Start, 277 volts, 60 cycles. There was no indication as to the PCB content of the capacitor nor was a manufacture date on the nameplate.



Photograph 41 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 41 shows a tar-like substance on the internal surface of the ballast cover on the next ballast examined in Room 149.

Photograph 42 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 42 shows a tar-like substance was sprayed on the interior surface of the ballast fixture.



Photograph 43 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 43 shows the capacitor referenced in photos 41 & 42 above was a Magnetek, 27 volts, 60 hertz, class P, non-PCB capacitor. It was not leaking at the time of the inspection. It appears that the tar-like substance came from the previous capacitor and the leaks were not cleaned up when the capacitor was changed out.

Photograph 44 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 44 shows the next ballast examined in Room 149 was a GE capacitor. The capacitor had ruptured and there was a tar-like substance on the external surface of the capacitor. There was no indication as to the PCB content nor was a manufacture date listed on the nameplate.



Photo 44



photo 45

Photograph 45 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 45 shows there was tar-like substance on the ballast cover over the GE Rapid Start Capacitor.

Photograph 46 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 46 show there was a tar-like substance on the interior surface of the next ballast cover examined in Room 149.



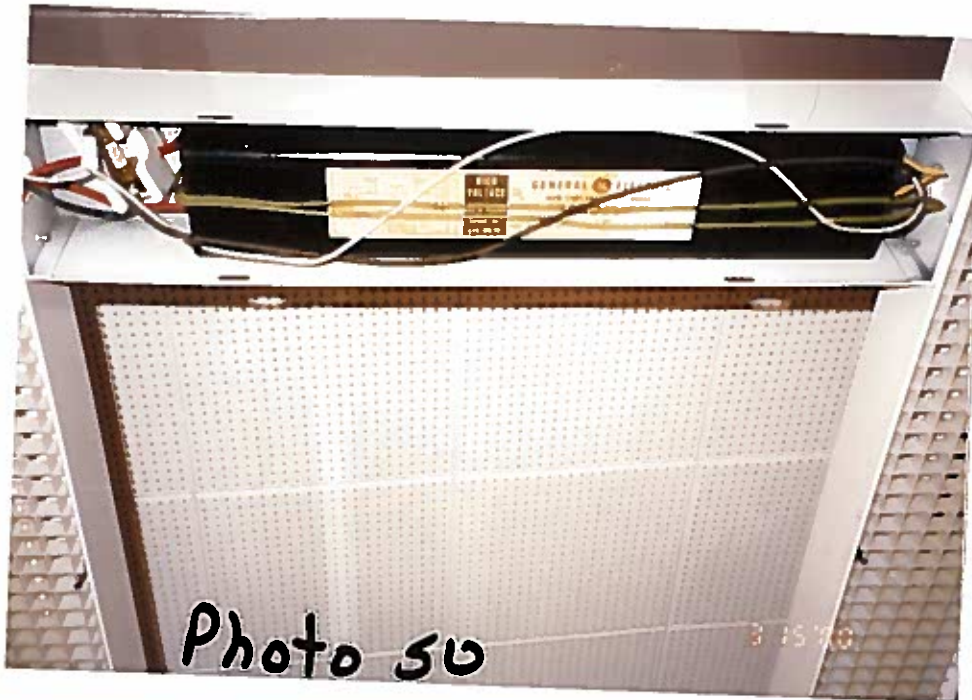
Photograph 47 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 47 shows the capacitor was a GE rapid start that appeared to be very old. There was no indication on the nameplate as to PCB content and nor was there a manufacture date on the nameplate. There was a tar like substance on the external surface of the capacitor. Student's desks were directly beneath this ballast.

Photograph 48 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 48 shows the next ballast was examined in Room 149 was also leaking. There was a tar-like substance on the external surface of the ballast cover.



Photograph 49 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 49 shows the capacitor was a Universal Therm-o-Matic 277 volts, 60 hz. There was a tar-like substance on the external surface of the capacitor. There was no indication as to PCB content on the nameplate nor was there a manufacture date on the nameplate.

Photograph 50 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 49 shows the last ballast examined in Room 149. The capacitor was a GE rapid start, 277 volts, 60 cycles. There was no indication as to PCB content on the nameplate nor was there a manufacture date on the nameplate. The capacitor was intact and non-leaking.



Photograph 51 taken by Eileen Hileman on March 15, 2000, at Glover Middle School, Spokane, Washington. Photograph 51 shows the double wrapped bags contained the gloves used by Mr. McCartney during the PCB inspection at Glover Middle School. Ms. Leandra Thompson has placed the bags on the custodian's desk to await pickup by the District's Industrial Hygienist.

TSCA INSPECTION, CASE, ENFORCEMENT, AND REFERRAL RECORD

INSPECTION:

INSPECTION DATE: 03/15/2000 FTTS ENTRY DATE: 6/26/00 INITIALS: WSP
 INSPECTOR NUMBER: 16131 INSPECTOR NAME: EILEEN HILEMAN INSPECT SEQ: 1 / 2 / 3
 LEGISLATION: T INVESTIGATION TYPE: 131 2XP 4CI 5CI 6PE 6PS 7CI 8CI REGION/STATE: 10 /
 REASON FOR INSPECTION: NSR / REFERRAL TYPE: FILE NUMBER:
 DATE REPORT REC'D: / / WARRANT REC'D: Y / N NUMBER SAMPLES: 0 / CBI: Y / N
 FACILITY FUNCTION: PD MN US /
 EPA ESTAB #: PRODUCT REG #: FEDERAL FACILITY: Y / N
 REMARKS:
 SITE NAME: GLOVER MIDDLE SCHOOL
 SITE ADDRESS: 2404 WEST LONGFELLOW AVENUE
 SITE CITY: SPOKANE SITE STATE: WA SITE ZIP: 99005 - 1547
 SITE COUNTY: (IF CITY = PORTLAND) SITE COUNTY CODE: 063
 SITE DUNNS: SIC CODE:
 PARENT NAME: (SAME AS ABOVE OR):
 PARENT ADDRESS/CITY/ZIP:

REVIEW DUE: / / STATUS: ACTIVE / CLOSED

CASE REVIEW:

FTTS ENTRY DATE: 6/26/00 INITIALS: WSP
 CASE REVIEW OFFICER: DD STUFF:
 REVIEW START: / / REVIEW COMPLETE: / / REVIEW PRELIM: / /
 ACTION WARRANTED: Yes / No VIOL CODE(S): 13A 5GR 6PR 8RR

ACTION/ENFORCEMENT:

FTTS ENTRY DATE: / / INITIALS:
 DOCKET NUM: CASE NUM:
 ACTION TYPE: ACTION STATUS: Active / Closed
 CASE DEVLMT OFFICER: EPA ATTY:
 PROPOSED PENALTY: \$ FINAL PENALTY: \$ ABATEMENT AMT: \$
 REGS VIOLATED: REMARKS:
 DATE TO ORC: / / DATE ISSUED: / / RESPONSE DUE: / / RESPONSE REC'D: / /
 DATE CLOSED: / / CAFO MAILED: / / CAFO RESP DUE: / / THEY SIGN: / /
 EPA SIGN: / /

SETTLEMENT CONDITIONS:

TERMS:	DATE DUE	DATE REC'D..	EBE (T/F)	PREV CODE	COST TO COMPANY	AMOUNT MITIGATED
1.	/ /	/ /				
2.	/ /	/ /				
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REFERRAL:

FTTS ENTRY DATE: / / INITIALS:
 REQUEST DATE: / / REFERRAL DATE: / / REFERRAL TYPE: ORIGIN:
 REFERRAL SEQ: DESTINATION: REFERRED BY:
 POSSIBLE VIOLATIONS: RESPONSE FROM REFERRAL: / /
 FURTHER ACTION (Y/N) / TYPE:
 SAMPLES REC'D.: Y / N ENFORCEMENT ISSUED: / / ENFORCEMENT TYPE: Major / Minor DATE CLOSED: / /
 REMARKS: